

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI  
CENTRAL DIVISION

SPENCER NORMAN, KEIFER  
NORMAN, COURTNEY NORMAN,  
HELEN S NORMAN

CAUSE NO. 2:12-CV-04210

Plaintiffs,

Vs

CAMDEN COUNTY, et al.

Defendants

**PLAINTIFFS' RULE 26(a)(2) DISCLOSURE OF EXPERT WITNESSES**

COME NOW Plaintiffs, by and through undersigned counsel, pursuant to Rule 26(a)(2) of the Federal Rules of Civil Procedure, and disclose the following expert witnesses:

1. Plaintiffs may call Ronald L. O'Halloran, M.D. who may testify as to the liability and negligence of the defendants and the nature and cause of the Decedent Glenn David Norman's fatal injuries. Dr. O'Halloran's C.V. and those materials required by Rule 26(a)(2) of the Federal Rules of Civil Procedure are attached hereto as Exhibit 1.

2. Plaintiffs may call Michael Leonesio, who may testify as to the liability and negligence of the defendants and the nature and cause of the Decedent Glenn David Norman's fatal injuries. Michael Leonesio's C.V. and those materials required by Rule 26(a)(2) of the Federal Rules of Civil Procedure are attached hereto as Exhibit 2.

3. Plaintiffs reserve the right to elicit opinion testimony from any of the Decedent Glenn David Norman's health care providers and/or the medical personnel who investigated the

Exhibit

Q

death of Glenn David Norman, all of whom may provide testimony as to the cause and nature of Decedent Glenn David Norman's fatal injuries, including, but not limited to:

- i. Mercy Hospital Springfield EMS personnel: who may testify as to the nature of Decedent Glenn David Norman's fatal injuries, the necessity of medical treatment and the necessity of the medical bills.
  - ii. Douglas Miller, M.D., PhD, Neuropathologist, University of Missouri School of Medicine: who may testify as to the nature and cause of the Decedent Glenn David Norman's fatal injuries.
  - iii. Carl Christopher Stacy, M.D., Medical Examiner: who may testify as to the nature and cause of the Decedent Glenn David Norman's fatal injuries.
  - iv. James Jungels, D.O., Camden County Coroner: who may testify as to the nature and cause of the Decedent Glenn David Norman's fatal injuries.
  - v. Elena Ladich, M.D., Staff Pathologist, CVPath Institute, Inc., who may testify as to the nature and cause of the Decedent Glenn David Norman's fatal injuries.
4. Plaintiffs reserve the right to elicit opinion testimony from any person designated by Defendants as an expert, as well as, any employees or agents of Defendants.

**THE SIMON LAW FIRM, P.C.**

By: /s/ Kevin M. Carnie, Jr.  
John G. Simon, #35321MO  
Kevin M. Carnie Jr., #60979MO  
800 Market Street, Suite 1700  
St. Louis, MO 63101  
Telephone: 314-241-2929

Facsimile: 314-241-2029  
[jsimon@simonlawpc.com](mailto:jsimon@simonlawpc.com)  
[kcarrie@simonlawpc.com](mailto:kcarrie@simonlawpc.com)

*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and accurate copy of the foregoing was sent this 24<sup>th</sup> day of April, 2013, to the following attorneys of record by:

- United States mail, postage pre-paid;  
 facsimile transmission; or  
 electronic mail.

D. Keith Henson  
Paule, Camazine & Blumenthal, PC  
165 North Meramec Ave., Suite 110  
St. Louis, MO 63105-3772  
314-727-2266  
314-727-2101 (fax)  
[khenson@pcblawfirm.com](mailto:khenson@pcblawfirm.com)  
*Attorney for Defendants Camden County,  
Brian D. Fiene, and Dwight D. Franklin*

/s/Kevin M. Carnie, Jr.